EXHIBIT P

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

	FOR THE DISTRICT OF DELAWARE
JAMES WILSO	N, et al
I	Paintiff,)
v.) C.A. No. 05-399-JJF
STANLEY TA	YLOR, et al.)
	AFFIDAVIT OF TOM CARVEN
1. 1	am employed by the State of Delaware, Department of Correction at the
Sussex Correct	onal Institution ("S.C.I."), in Georgetown, Delaware as a Recreation
Program Leader	I have been employed by the Department of Correction for _28.5
years. My dut	es includeAll phases of security and recreation of the gym area and
have held this	osition since1997
2.	position held by an inmate in the gym at S.C.I. would be as a
recreational aid	e.
3.	ose Serpa was never considered nor did he ever ask to be considered for a
position as a re-	reational aide in the gym during his incarceration at S.C.I.
9.	have made these statements based upon my personal knowledge,
specialized trai	ning, and experience as an employee of the Department of Correction.
	Tom Carven

SWORN AND SUBSCRIBED before me this ___19____day of July, 2007.

JUDITH ANN LEDERMAN NOTARY PUBLIC, STATE OF DELAWARE My Commission Expires August 19, 2007